

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**SHU SHEAN WONG
AND CRYSTAL WONG,
PLAINTIFFS**

VS.

**DEPARTMENT OF SOCIAL
SERVICES, ET ALS.
DEFENDANTS**

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) **CASE NO: 1:09-cv-12121-DPW**
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**DEFENDANT NUMBER 11, THE JOLICEOUR SCHOOL'S, MOTION TO
DISMISS THE PLAINTIFFS' COMPLAINT**

The Defendant, Joliceour School, which is identified as Defendant 11 in the Complaint, hereby move that this Honorable Court dismiss the Plaintiffs' Complaint for lack of personal jurisdiction, failure to properly plead sufficient facts and for failure to state a claim upon which relief can be granted pursuant to Fed. R. Civ. P. 12(b)(6). In support of this Motion, the Defendant submits the attached Memorandum of Law.

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the within document was served upon the Plaintiff by U.S. Mail and upon the attorney of record for each party.

DATED: March 8, 2010

**Defendant,
By its Attorneys,**

**/s/ Michael P. Roche
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